

1 RYAN J. MARTON (223979)
ryan@martonribera.com
2 CAROLYN CHANG (217933)
carolyn@martonribera.com
3 HECTOR J. RIBERA (221511)
hector@martonribera.com
4 CHIEN-JU ALICE CHUANG (228556)
cjalice@martonribera.com
5 PHILLIP J. HAACK (262060)
phaack@martonribera.com
6 MARTON RIBERA SCHUMANN & CHANG LLP
548 Market Street, Suite 36117
7 San Francisco, CA 94107
8 Tel.: (415) 360-2511

9
10 *Attorneys for Zoho Corporation and Zoho
11 Corporation Pvt., Ltd.*

SANDEEP SETH (SBN 195914)
ss@sethlaw.com
SETH LAW OFFICES
Two Allen Center
1200 Smith Street, Suite 1600
Houston, Texas 77002
Tel.: (713) 244-5017

ROBERT J. YORIO (SBN 93178)
yorio@carrferrell.com
STACEY M. TAM (SBN 292982)
stam@carrferrell.com
CARR & FERRELL LLP
120 Constitution Drive
Menlo Park, California 94025
Tel.: (650) 812-3400

12 *Attorneys for Sentius International, LLC*

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15
16 ZOHO CORPORATION,

17 Plaintiff,

18 v.

19 SENTIUS INTERNATIONAL, LLC

20 Defendant.

21 SENTIUS INTERNATIONAL, LLC,

22 Counterclaimant,

23 v.

24 ZOHO CORPORATION and ZOHO
25 CORPORATION PVT., LTD.

26 Counter-Defendants.

27 CASE NO. 4:19-cv-00001-YGR

28
**STIPULATION AND [PROPOSED]
ORDER RE EXTENSION OF
CERTAIN CASE SCHEDULE
DEADLINES**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties, by and through their respective
 2 Counsel hereby stipulate to move the deadlines for fact discovery and expert reports as recited in the
 3 table below. These changes are necessary in order to accommodate the production of additional
 4 documentation by the parties and the scheduling and conducting of depositions in light of COVID-19
 5 related orders and concerns.

6 The parties previously stipulated to extend by one week the deadlines for Plaintiff and
 7 Counter-defendant Zoho Corporation and Counter-defendant Zoho Corporation Pvt. Ltd. to respond
 8 to the counterclaims of Defendant and Counterclaimant Sentius International, LLC and to serve
 9 Invalidity Contentions (Dkt. 42). The parties later stipulated to move the deadlines for serving
 10 Damage Contentions and Claim Construction exchanges (Dkt. 44) and the deadline for filing the Joint
 11 Claim Construction and Prehearing Statement (Dkt. 48). The parties have not made any other
 12 requested extensions and this stipulation affects only those recited that have been set by the Court.

Event	Current Deadline	New Deadline
Close of Fact Discovery	July 31, 2020	September 29, 2020
Opening Expert Reports	July 31, 2020	October 20, 2020
Rebuttal Reports	August 28, 2020	November 17, 2020
Close of Expert Discovery	September 25, 2020	December 22, 2020
Daubert/MSJs	October 30, 2020	January 26, 2021

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: June 11, 2020

CARR FERRELL LLP

By */s/ Robert J. Yorio*
Robert J. Yorio

Attorneys for Defendant and Counterclaimant
SENTIUS INTERNATIONAL, LLC

Dated: June 11, 2020

MARTON RIBERA SCHUMANN
& CHANG LLP

By */s/ Ryan J. Marton*
Ryan J. Marton

Attorneys for Plaintiff and Counter-Defendants
ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.

ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: June 12, 2020

By: Honorable Yvonne Gonzalez Rogers
Honorable Yvonne Gonzalez Rogers
Judge of the United States District Court